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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LUXX INTERNATIONAL, LLC, a Florida
limited liability company; and WAYDE KING,
an individual,

Plaintiffs,

vs.

PURE WATER TECHNOLOGIES, a Nevada
limited liability company; TASTY ONE, LLC,
a foreign limited liability company; MICHAEL
KAPLAN, an individual; and ADAM
KAPLAN, an individual.

Defendants.

Case No.: 2:23-cv-00512-MMD-DJA

**ORDER GRANTING
STIPULATED MOTION FOR
EXTENSION OF TIME**

(FIRST REQUEST)

1 COME NOW, all Plaintiffs and all Defendants jointly, and submit this stipulated
2 request for extension of time for Plaintiffs to file an opposition to Defendants' motion for
3 partial summary judgment ("MPSJ") that was filed on February 25, 2025. (ECF No. 94.)

4
5 **I. Facts**

6 Plaintiffs brought this action against Defendants for various counts, including
7 trademark infringement, violations under the Lanham Act, violations of Plaintiff Wayde
8 King's rights of privacy, breach of contract, and the like. Defendants moved for partial
9 summary judgment on February 25, 2025. (ECF No. 94.) Plaintiffs' opposition thereto is
10 currently due by March 18, 2025.

11 **II. Argument**

12 The parties are actively collaborating efforts to settle the case. Given the complexities
13 of the case, especially a lien placed on the case (pursuant to NRS 18.015) by Plaintiffs'
14 former counsel Lewis Roca Rothgerber Christie LLC (now Womble Bond Dickinson) that
15 is posing a significant impediment to the parties' settlement efforts, the parties' settlement
16 efforts are taking longer. (*See* ECF No. 91.) To help the process, the parties have a continued
17 Early Neutral Evaluation scheduled with Hon. Magistrate Judge Brenda Weksler on March
18 19, 2025. (*See* ECF No. 95.)

19
20 The parties mutually prefer their settlement efforts to be their primary focus. Given
21 the impending deadline of March 18, 2025 to oppose the MPSJ, the parties mutually agree
22 that the deadline should be extended to April 10, 2025.

23
24 Accordingly, all parties respectfully request an extension for Plaintiffs' opposition to
25 the pending MPSJ to April 10, 2025.

26 This is the first request for extension of time for Plaintiffs' opposition to the MPSJ.
27 *See* LR IA 6-1. Such extension will extend the current deadline of March 18, 2025 to April
28

1 10, 2025. This request for extension is not made for delay, and good cause exists for the
2 extension as explained above.

3 **III. Conclusion**

4 WHEREFORE, Plaintiff and Defendants jointly request the Court to grant an
5 extension for Plaintiffs' opposition to Defendants' motion for partial summary judgment
6 (ECF No. 94) to April 10, 2025.

7 DATED this 13th day of March, 2025.

8 Respectfully submitted,

9
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25 DATED THIS 14th Day of March 2025.

26 IT IS SO ORDERED.

27 
28

MIRANDA M. DU
U.S. DISTRICT JUDGE